



STATE OF ALASKA  
DEPARTMENT OF ADMINISTRATION  
**PUBLIC DEFENDER AGENCY**

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December 16, 2020

Ms. Meredith Montgomery  
Clerk of the Appellate Courts  
303 K Street  
Anchorage, AK 99501-2084

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Via email and hand delivery

Re: *Chilcote v. State*, A-13031: Notice of Supplemental Authority

Dear Ms. Montgomery:

Pursuant to Appellate Rule 212(c)(12), this letter serves as a notice of supplemental authority to the briefing filed in this case.

The supplemental authority is

- 1) *State v. Eden*, 256 S.E.2d 868, 873-77 (W.Va. 1979), as relates to pages 19-22 of the opening brief and 18-20 of the reply brief.

Sincerely,

Emily Jura  
Assistant Public Defender

cc: Tim Terrell, Office of Criminal Appeals (by email and hand delivery)